



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ALC/LHE/SME
F. #2016R00505

271 Cadman Plaza East
Brooklyn, New York 11201

August 30, 2017

By ECF and Email

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Re: United States v. Mark Nordlicht, et al.
Criminal Docket No. 16-640 (DLI)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017, April 12, 2017, April 26, 2017, May 5, 2017, May 11, 2017, May 26, 2017, June 16, 2017, June 20, 2017, July 3, 2017, July 6, 2017, July 17, 2017, July 27, 2017, August 21, 2017 and August 22, 2017. The government again requests reciprocal discovery from the defendants.

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The government has made available at First Choice Copy (“First Choice”) for reproduction to the defendants, pursuant to the terms and restrictions of the Stipulation and Order filed on January 23, 2017 in the above-captioned case (the “Protective Order”), ECF No. 76; see id. ¶¶ 1-5 & 7, the following materials:

- Business records and other documents obtained by the United States Securities and Exchange Commission (“SEC”) from:

B Asset Manager	SEC-NY-09271-EPROD-003799819 - SEC-NY-09271-EPROD-003956191
CNO Financial Group	SEC-NY-09271-EPROD-003956192 - SEC-NY-09271-EPROD-004049399
Capital One	SEC-NY-09271-EPROD-004049400 - SEC-NY-09271-EPROD-004113854; SEC-NY-09271-EPROD-004275383
CohnReznick	SEC-NY-09271-EPROD-004113855 - SEC-NY-09271-EPROD-004117874
Credit Suisse	SEC-NY-09271-EPROD-004117875
Duff & Phelps	SEC-NY-09271-EPROD-004117876 - SEC-NY-09271-EPROD- 004133621
Senior Health Insurance Company of Pennsylvania	SEC-NY-09271-EPROD-004133622 - SEC-NY-09271-EPROD-004134065
First National Bank of Central Texas	SEC-NY-09271-EPROD-004134066 - SEC-NY-09271-EPROD-004135094
KPMG	SEC-NY-09271-EPROD-004135095 - SEC-NY-09271-EPROD-004148750
Old Mutual Bermuda Holdings	SEC-NY-09271-EPROD-004148751 - SEC-NY-09271-EPROD-004148754
Bermuda Monetary Authority	SEC-NY-09271-EPROD-004148755 - SEC-NY-09271-EPROD-004162221
Cayman Island Monetary Authority	SEC-NY-09271-EPROD-004162222 - SEC-NY-09271-EPROD-004180606

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Financial Industry Regulatory Authority	SEC-NY-09271-EPROD-004180607 - SEC-NY-09271-EPROD-004180611
JPMorgan Chase	SEC-NY-09271-EPROD-004180612 - SEC-NY-09271-EPROD-004210149
Signature Bank	SEC-NY-09271-EPROD-004210150 - SEC-NY-09271-EPROD-004219881
An investor in PPVA	SEC-NY-09271-EPROD-004219882 - SEC-NY-09271-EPROD-004221273
TriNet	SEC-NY-09271-EPROD-004221274 - SEC-NY-09271-EPROD-004275369
United Parcel Service	SEC-NY-09271-EPROD-004275370 - SEC-NY-09271-EPROD-004275382

Also attached is an index entitled “2017.08.30 Bank Records Index” that describes the bank records produced in the instant disclosure (the sources and Bates ranges of which are also indicated in the chart above).

- Materials obtained from the following individuals formerly associated with Platinum Partners (note that the prefix for each of the below Bates ranges is either the initials or the last name of the relevant individual):
 - EDNY000001 – EDNY002601;
 - 000001 – 000127;
 - USAO-00001 – USAO001409;
 - 000000001; and
 - 000001 – 003961.

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You may obtain copies of the materials listed above by contacting Joseph Meisner at First Choice at 718-381-1480, extension 212, and referencing the print order number provided by email. First Choice is located at 52-08 Grand Avenue, Maspeth, New York 11378.

Very truly yours,

BRIDGET M. ROHDE
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cc: Clerk of the Court (DLI) (by ECF) (w/o enclosures)